



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WMP/AES
F. #2014R00501

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 16, 2016

By ECF and FedEx

Joel Cohen, Esq.
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200 Park Avenue
New York, NY 10166-0193

Re: United States v. Martin Shkreli, et al.
Criminal Docket No. 15-637 (KAM)

Dear Counsel:

In accordance with Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. This disclosure supplements the government's earlier disclosure under cover of letters dated December 22, 2015 and January 15, 2016. In addition, this disclosure is governed by the stipulation entered into between the government and defendant Evan Greebel on March 15, 2016, and so ordered by the Court on March 16, 2016. The government again requests reciprocal discovery from the defendant.¹

Enclosed please find a thumb drive² that contains copies of the following materials:

¹ Note that the government has not yet received a signed stipulation from defendant Martin Shkreli regarding discovery materials. Once that stipulation is received, the government will file it with the Court for the Court's signature, and will provide defendant Shkreli with the same discovery materials enclosed with this letter at that time.

² Once you have downloaded the discovery from the thumb drive, please return the drive to our office so that we can re-use it for the next production; we can only provide one thumb drive per defendant. Alternatively, you may provide us with a thumb drive or external hard drive that we can use for future productions.

Description	Bates Range
Exhibits to and Indices for Affidavit in Support of <u>Ex Parte</u> Request for <u>In Camera</u> Review, filed in <u>In re Grand Jury Investigation</u> , 15-MC-2227 (JBW), at Docket No. 10	These redacted documents have been produced in PDF form and are contained in a folder titled "USAO-EDNY." The documents are identified by "RP" or "KMR_RTRX" Bates number as well as by tab number; indices have been provided to identify the paragraph(s) in the affidavit where each document is located. These documents were originally received by the government from Retrophin, Inc. ³
Records received from Retrophin, Inc.	R023546 to R024565
Records received from individual DB ⁴	C***000001 to C***000777
Records received from individual SB	SHB000001 to SHB000181
Records received from individual AG	AG000001 to AG001108
Records received from individual DG	DG-000000001 to DG-000000097
Records received from individual FH	FH-EDNY00000001 to FH-EDNY00000012
Records received from individual SH	SH-EDNY 00000001 to SH-EDNY 00002101
Records received from individual RJ	RJ-00001 to RJ-00151
Records received from individual JN	JN 0619 to JN 0620
Records received from individual TP	P*****000001 to P*****000266
Records received from individual SR	SR000001 to SR006727
Records received from individual SR	R*****0000001 to R*****0000104

³ Please note that the unredacted versions of these documents were previously produced as part of the January 15, 2016 discovery production, and can be found at the Bates range R023130-R023534.

⁴ To protect the privacy of individuals who have produced records, the government references these individuals by their initials only; in addition, to the extent that the Bates prefix reveals the identity of an individual, portions of the prefix have been replaced here with asterisks (**). The identity of these individuals is readily apparent from the records enclosed herein; however, should the defendants have any questions about the identity of these individuals, the government will provide that information under separate cover.

Description	Bates Range
Records received from individual LR	LR00000001 to LR00004932
Records received from individual BS	BS_00000001 to BS_00003422
Records received from individual CS	S*****000001 to S*****000129
Records received from individual ES	S*****DOJ00001 to S*****DOJ 01823
Records received from individual JS	SU000001 to SU000523
Records received from Apex Clearing	APEX-000001 to APEX-001834
Records received from Fidelity	Fidelity-000001 to Fidelity-000422
Records received from Interactive Brokers	Interactive-000001 to Interactive-003002
Records received from RBC	RBC-000001 to RBC-000551
Records received from Scottrade	Scottrade-000001 to Scottrade-001688
Records received from UBS	UBS-000001 to UBS-001181
Records received from Citrin Cooperman	CITRON313897 to CITRON2649670
Records received from Experian	Experian-000001 to Experian-000022
Records received from Go Daddy	GD 000001 to GD 000570

In addition, enclosed please copies of the following materials received by the United States Attorney's Office from the United States Securities and Exchange Commission ("SEC"):

Description	Bates Range
Records received from individual JN	SEC-N****-P-0000010 to SEC-N****-P-0000618

Please also note that the thumb drive is encrypted, and that the password for the drive will be provided via email. If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

ROBERT L. CAPERS
United States Attorney

By: /s/ Alixandra Smith
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Jacquelyn Kasulis
Alixandra Smith
Assistant U.S. Attorneys
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Enclosure

cc: Clerk of the Court (KAM) (by ECF) (w/o enclosures)
Counsel for defendant Martin Shkreli (by ECF)